

Exhibit P-1

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Reference No. 3165851-1996045

IN THE THIRD DISTRICT COURT, SALT LAKE CITY DEPARTMENT
SALT LAKE COUNTY, STATE OF UTAH

N.A.R., INC.

Plaintiff,

v.

ELIZABETH HERNANDEZ

Defendant(s).

C O M P L A I N T

Case No.

JUDGE

Plaintiff, N.A.R., INC., complains of Defendant(s) and
alleges as follows:

1. That Plaintiff is a Utah Corporation, with its principal
place of business in Salt Lake County, Utah.

2. That Defendant(s) are residents of, or the subject agree-
ment was executed in, SALT LAKE COUNTY.

3. That the amount in controversy, exclusive of costs, interest
and attorneys' fees does not exceed \$10000.00.

4. That under the terms of a signed agreement, Defendant(s)
are indebted to:

MOUNTAIN AMERICA CREDIT UNION,
which has performed its obligations under any contract, in the
assigned balance of \$5397.78, for financial services, together

with interest thereon at the current rate of 10.00% per annum since 10/29/2019.

5. That the agreement provides for a reasonable attorney's fee. (See attached).

6. That prior to this action the above account was assigned to Plaintiff herein, who is now entitled to bring suit thereon.

7. That Plaintiff has demanded payment of the sum due and Defendant(s) refused, or failed, to pay.

8. That the assigned balance may include a collection agency fee.

9. That the attorney will not share any attorney fee awarded or any portion thereof in violation of Rule 5.4, Utah Rules of Professional Conduct.

WHEREFORE, Plaintiff prays for judgment against Defendant(s) in the sum of \$5397.78, together with a collection agency fee of \$0.00, court costs, and interest thereon, at 10.00% per annum since 10/29/2019, post judgment interest at 11.53% per annum from the date of judgment, and a reasonable attorney's fee pursuant to Rule 73(d), Utah Rules of Civil Procedure, in the amount of \$350.00, or as established by affidavit pursuant to 73(a) URCP.

DATED this 31 day of AUGUST, 2020.

OLSON SHANER

/s/ Chip Shaner

By:_____

Chip Shaner

Attorneys for Plaintiff

Plaintiff's Address:
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